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Attorneys for Defendant

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

ASHLEY RUDOLPH,

No. 2:20-cv-00922-DMC

Plaintiff.

STIPULATION AND ORDER FOR EXTENSION
TO FILE DEFENDANT'S OPPOSITION TO
PLAINTIFF'S MOTION FOR SUMMARY
JUDGMENT AND/OR REMAND

V. KILOLOKUAZI

Defendant

The parties stipulate through counsel that Defendant, the Commissioner of Social Security (the “Commissioner”), shall have a 60-day extension of time to file her opposition to Plaintiff’s motion for summary judgment. Defendant’s response is currently due November 23, 2021.

The Special Assistant United States Attorney assigned to this case is currently on extended leave. He is expected to return in early January. At this point, a more immediate re-assignment to another staff attorney is not tenable given the high volume of cases and limited staff due to leave and resignations.

This request is made in good faith and is not intended to delay the proceedings in this

1 matter.

2 WHEREFORE, Defendant requests until January 24, 2022¹, to file her response to
3 Plaintiff's motion for summary judgment.

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5 Respectfully submitted,

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7 DATE: November 18, 2021

8 */s/ Josephine Gerrard* _____

9 JOSEPHINE GERRARD

10 Attorney for Plaintiff

11 (as approved via email on November 18, 2021)

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13 PHILLIP A. TALBERT
14 Acting United States Attorney

15 DATE: November 18, 2021

16 By */s/ Geralyn Gulseth* _____

17 GERALYN GULSETH

18 Special Assistant United States Attorney

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20 Attorneys for Defendant

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22 ORDER

23 Pursuant to stipulation, it is so ordered.

24 Dated: November 29, 2021

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DENNIS M. COTA

UNITED STATES MAGISTRATE JUDGE

1 The 60th day - January 22, 2022 - falls on a Saturday.